

Special Provisions

UNE Ordering Performance Measures:

Verizon-MA will provide an additional \$1,058,333 in monthly bill credits for UNE Order Confirmation Performance based on four POTS metrics included in the MOE category. If on-time performance falls below 90% for any month, a credit of \$264,5835 for each metric missing the standard will be distributed like the bill credits under Critical Measures. Funding for these credits will be taken from funds that are unused in 6 previous months or from the current month. No new funds are available. The metrics and standards are as follows:

Metric #	POTS Electronically Submitted	Threshold
OR-1-04	% On Time LSRC < 10 Lines	< 90%
OR-1-06	% On Time LSRC ≥ 10 Lines	< 90%
OR-2-04	% On Time Reject < 10 Lines	< 90%
OR-2-06	% On Time Reject ≥ 10 Lines	< 90%

Flow Through:

An additional \$5.29 Million per year is available for flow through performance. Two performance measures for UNE from the Carrier to Carrier Performance Guidelines will be used to measure performance with the performance scores set forth below

Metric #		Threshold
OR-5-01	% Flow Through – Total – UNE	≥ 80%
OR-5-03	% Flow Through – Achieved – UNE	≥ 95%

For each measure, the UNE scores will be combined and reviewed on a quarterly basis. If the combined score meets either target, no additional credits are due. If the combined score meets neither metric target for that quarter, then \$1,322,500 will be credited to all CLECs purchasing UNEs based on the number of lines in service. Lines in service will equal: UNE-P, UNE Loops, IOF, and EEL Loops.

Performance will ~~be~~ measured for the first time under this measure upon Verizon-MA's entry into the InterLATA market. The prior three months will be examined to determine if bill credits are due.

The following table demonstrates the calculation of quarterly flow through performance:

Quarterly Flow Through Performance:

	Month 1	Month 2	Month 3	Quarter Total
Total Orders that Flow Through UNE	15000	18000	17000	50000
Total Orders Processed UNE	25000	21000	22000	68000
Total % Flow Through - UNE Combined for Quarter:				73.5%
Total Orders that Flow Through UNE	15000	18000	17000	50000
Total Orders Designed to Flow Through: UNE	18000	19000	18000	55000
Total % Achieved Flow Through – UNE Combined for Quarter:				90.9%

In this ~~example~~, neither metric met the performance threshold, therefore, \$1,322,500 would ~~have been credited~~ to all CLECs purchasing UNEs.

Additional Hot Cut Loop Performance Measures:

An additional \$12.70 Million per year is available for Hot Cut Loop performance. This measure will be composed of two performance metrics: PR-9-01 – “% On Time - Hot Cut Loop” and PR-6-02 – “% Installation Troubles within 7 Days – Hot Cut Loop.”¹ If either one of these thresholds is missed, additional bill credits will be distributed to the CLECs.

¹ These two measures are also included in the Critical Measurements method, and additional bill credits may be due if Verizon-MA does not satisfy that Critical Measure.

This measure has two tiers of performance standards. Tier I will be applied to a two month scenario, and Tier II will be applied to a one month scenario. The Tier I threshold is measured based on two consecutive months of performance, while the Tier II threshold is measured based on an individual month's performance. The performance thresholds are contained in the table below:

Metric #		Tier I Threshold	Tier II
PR-9-01	% On Time Hot Cut Loop ²	< 90%	< 85%
PR-6-02	% Installation Troubles within 7 Days – Hot Cut Loop	≥ 3.00%	≥ 4.00%

Under Tier I, if Verizon-MA does not satisfy the above standards for two consecutive months, it will distribute \$529,166 million to the affected CLECs. Under Tier II, if Verizon-MA does not satisfy the above standards for a single month, it will distribute \$1,058,333 million to the affected CLECs. Below is an example of how this measure would work.

Example:

Metric #		Performance For Month 1	Performance for Month 2	Performance for Month 3	Performance for Month 4
PR-9-01	% On Time Hot Cut Loop	84%	91%	91%	91%
PR-6-02	% Installation Troubles within 7 Days – Hot Cut Loop	2%	3.5%	2%	3.5%
	Credit for the Month	\$1,058,333	\$529,166	\$0	\$0

In month 1, Verizon-MA did not satisfy the more stringent requirements of Tier II and \$1,058,333 in bill credits would be due.

In month 2, Verizon-MA satisfied the performance standard under Tier II, but not the less severe standard under Tier I. Bill credits would be due, however, because Verizon-MA failed to meet the Tier I standard two months in a row. (Month 1 counts against Verizon-MA.)

In month 3 both the Tier I and II standards were met, Verizon-MA would owe nothing.

In month 4, the Tier I performance standard was not met, but no bill credits would be due since Tier I requires Verizon-MA to fail these performance standards two months in a row. Verizon-MA service in month 3 was satisfactory. Month 5 would determine whether bill credits would be due under either Tier I or Tier II.

ELECTRONIC DATA INTERFACE MEASURES

This Special Provision includes three measures to ensure that the Electronic Data Interface between Verizon-MA's operational support systems and the CLEC systems operate in a non-discriminatory fashion. An additional \$9.52 million per annum in bill credits is available for these three measures.

A. % Missing Notifier Trouble Ticket PONS cleared within 3 Business Days

Verizon-MA will provide an addition \$528,889 in bill credits each month for a new measure “% Missing Notifier Trouble Ticket PONS Cleared Within 3 Business Days.” If performance falls below 90% for any month on this measure, or more than 5% of the orders resubmitted by CLECs related to trouble tickets at Verizon-MA's request are rejected as duplicates, a credit of \$528,889 will be allocated to all CLECs using the EDI interface based on the number of lines in service. Lines in service will equal: UNE-P, UNE Loops, IOF, EEL Loops and Resold Lines. Copies of the measures not contained in the Carrier to Carrier Guidelines (12/00 version) are attached. The measures and standards are as follows:

Measure #		Threshold
PO-9-01	% Missing Notifier Trouble Ticket PONS Cleared within 3 Bus. Days	< 90%
OR-3-02	% Resubmission Rejection	> 5%

² % On Time – Hot Cut Loop performance will be adjusted such that any missed appointment for

B. % SOP To Bill Completion Notice Sent Within 3 Business Days

Verizon-MA will provide an additional \$264,444 in bill credits each month for a new measure “% SOP to Bill Completion Notice Sent Within 3 Business Days.” A copy of the measure is attached. If performance falls below 90% for any month, the bill credits will be allocated to all CLECs using the EDI interface based on the number of lines in service as defined above. The metric and standard is as follows:

Measure #		Threshold
OR-4-09	% SOP to Bill Completion Within 3 Business Days	< 90%

customer reasons – due to late FOC will be counted as a miss.

Function:		
PO-9 Timeliness of Trouble Ticket Resolution		
Definition:		
The percent of EDI missing notifier trouble ticket PONS cleared within 3 business days from the day of receipt of the trouble ticket. The elapsed time begins with receipt at the Verizon Systems Support Help Desk of a trouble ticket for EDI missing notifiers (i.e., order acknowledgement, order confirmation, order rejection, work completion, and billing completion notices) with the PONS in questions enumerated with the appropriate identification. The ticket is considered cleared when Verizon has either requested the CLEC to resubmit the PON or communicated the current status of the PON and provided the delayed status notifier to the CLEC. Tickets received after 5 PM and trouble ticket clearances sent after 5PM will be considered effective on the following business day. Performance will be based on the time that the trouble ticket is received.		
Exclusions:		
<ul style="list-style-type: none">• The PONs shall be considered to be timely cleared if Verizon provides the status notifier after 3 business days at the request of the CLEC or because of CLEC system capacity or availability may cause VZ to miss the 3 day target.• Out of sequence notifiers. This type of ticket indicates that the CLEC has received one or more notifiers for a PON but not in the sequence expected.		
Performance Standard:		
90% threshold for Special Provisions		
Report Dimensions:		
Company: <ul style="list-style-type: none">• CLEC aggregate		Geography: <ul style="list-style-type: none">• State
Products	<ul style="list-style-type: none">• EDI Notifier Trouble Tickets	
Sub-Metrics:		
PO-9-01	% Missing Notifier Trouble Ticket PONS Cleared within 3 Bus. Days	
Calculation	Numerator	Denominator
	Number of EDI missing notifier trouble ticket PONS in denominator cleared within 3 business days after receipt.	Total number of EDI missing notifier trouble ticket PONS submitted.

Function		
OR-4 Timeliness of Completion Notification		
Definition:		
Resale & UNE combined:		
<u>Completion Notification Response Time:</u>		
The elapsed time between the actual order completion in the Service Order System (SOP) and the distribution of the billing completion notification. If multiple orders have been generated from a single CLEC/Reseller request, the measure is taken between completion of the last order associated with the request and the distribution of the completion notification.		
Exclusions:		
<ul style="list-style-type: none"> • VZ Test Orders • When the order completion time in the billing system cannot be determined, the order is excluded from the measurements, and the percentage of orders so excluded is reported each month. • From OR-4-09; Complex Resale Orders 		
Performance Standard:		
OR-4-09: 90% threshold for Special Provision.		
Report Dimensions OR-4 Completion Notification		
Company:		Geography:
<ul style="list-style-type: none"> • CLEC Aggregate • CLEC Specific 		<ul style="list-style-type: none"> • State
Sub-Metrics		
OR-4-09	% SOP to Bill Completion Within 3 Business Days	
Products	<ul style="list-style-type: none"> • EDI Orders 	
Calculation	Numerator	Denominator
	Total number orders in denominator for which billing completion notices (BCN) are time-stamped in DCAS within 3 business days of SOP completion.	Number of SOP Completed Orders during the report period.

APPENDIX I

CHANGE CONTROL ASSURANCE PLAN

VERIZON - MASSACHUSETTS

OCTOBER 2000

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APPENDIX I-A – Change Control Measures

I. INTRODUCTION

To ensure that Verizon Massachusetts (“Verizon-MA”), will execute the Change Control process in an ~~expeditious~~ and non-discriminatory manner, Verizon-MA will undertake the actions set forth in this Change Control Assurance Plan (the “C.C.A.P.”) after entry into the long distance market pursuant to Section 271 of the Telecommunications Act of 1996. A total of \$13.2 million in bill credits will be at risk to CLECs if Verizon-MA provides unsatisfactory service for the four measures in this Plan.

II. THE CHANGE CONTROL MEASURES AND BILL CREDITS

The following measures are included in this Plan:

1. PO-4-01: % Change Management Notices Sent on Time;
2. PO-4-03: Change Management Notice Delay 8 plus Days;
3. PO-6-01: % Software Validation; and
4. PO-7-04: Delay Hours - Failed/Rejected Test Transactions - No

Workaround.

Attached hereto as Appendix A is a chart that provides the standards that will be applied to each of the ~~above~~ measures and the total amount of bill credits associated with each standard. If a performance measure is missed according to its standards, bill credits will be paid to all CLECs purchasing Unbundled Network Elements (“UNEs”) or resold services. CLECs will receive bill credits on a prorated basis of the total credit determined using Appendix A based on their lines in service. This Plan will use the same mechanisms set forth in the Performance Assurance Plan for determining “lines in service.” (See P.A.P. Section II (C)(2))

Under this Change Control Assurance Plan, Verizon-MA will retain the right to withdraw any proposed software release prior to the item being put into final production. If Verizon-MA exercises this right, it will not be deemed to have violated the requirements set forth in PO-4-01,

PO-4-03, PO-6-01 or PO-7-04 and will not be subject to the payment of bill credits under those measures.

The initial amount of annual bill credits for all CLECs will be \$5.28 million under this Plan. If, however, the bill credits due to the CLECs under this Plan exceed \$5.28 million in any year,¹ an additional amount of \$7.92 million will be at risk from the bill credit amounts allocated to the Mode of Entry Categories in the Performance Assurance Plan. Thus, a total of \$13.2 million will be available for bill credits for the Change Control measures. Bill credit payments for Change Control measures will be given priority over bill credits for the MOE categories.

The Department will have the authority to reallocate the monthly distribution of bill credits between and among any provisions of the P.A.P. and the C.C.A.P. The Department will give the Company 15 days notice prior to the beginning of the month in which the reallocation will occur. Any reallocation will be done pursuant to Department order.

III. MONTHLY REPORTS

Each month Verizon-MA will issue a report on its performance on the above measures to each CLEC providing service in Massachusetts.² The reports will be CLEC specific and will indicate the scores on the measures, the aggregate amount of bill credits, if any, that Verizon-MA must provide pursuant to the standards set forth in Appendix I-A, and the specific amount of bill credits that will appear on the individual CLEC's bill. All CLECs with multiple bill accounts

¹ The "year" will be measured from the first day of Verizon-MA's entry into the interLATA market.

² Verizon-MA's performance on the other Change Control metrics will be reported in the monthly C2C reports.

must inform Verizon-MA as to which of their accounts should receive any bill credits for the Change Control measures.

IV. REVIEWS, UPDATES AND AUDITS

- Annual reviews and updates will occur under this Plan until the Department determines otherwise. However, Verizon-MA, after consulting with Staff, may at any time recommend to the Department modifications, additions, or deletions to the measures in this Plan or the bill credit allocations. CLECs and any other interested parties will be given an opportunity to provide comments on any recommendations. In addition, Staff will have the right from time to time, on 60-days notice to Verizon-MA, to conduct an audit of data reported in the monthly reports.³

V. EXCEPTION PROCESS

Verizon-MA will have the right to file a petition with the Department seeking to have the standards contained in Appendix I-A waived or modified either for future or past periods. The Department shall grant such a request if it determines that the application of one or more of the standards contained in Appendix I-A would not serve the public interest. The application of one or more parts of Appendix I-A would not serve the public interest if Verizon-MA could not, through any reasonable efforts, prevent results that do not satisfy the standards. Verizon-MA's petition must include all information that demonstrates how the measure was missed. It shall also include a recalculation of the measure with the challenged information excluded from the calculations. CLECs and other interested parties will be given an opportunity to respond to any Verizon-MA petition for an Exception. In the event the Department rules in Verizon-MA's

³ Unlike the most of the measures in the P.A.P., the recording of data for each of the measures in this Plan will be done manually.

favor, Verizon-MA will have the right to offset any paid bill credits against any future bill credits that may come due for either the Change Control measures or Performance Assurance Plan measures.

VI. TERM OF PLAN FOR THE CHANGE CONTROL PROCESS

The Change Control Assurance Plan will have the same term as the Performance Assurance Plan. It will remain in effect, as modified from time to time by the Department, until the Department rescinds the Performance Assurance Plan or develops a replacement mechanism.

VII. FULLY INTEGRATED DOCUMENT

The terms and provisions of this Plan are submitted in their entirety to the Department for approval. This Plan represents a fully integrated statement of the commitments Verizon-MA will undertake, including the payment of bill credits for unsatisfactory performance under the measures. It is not offered to the Department for approval on a piecemeal basis.

Change Control Performance Assurance Plan Measures

PO-4-01	% Change Management Notices Sent on Time			
	Performance Range (Notification and Confirmation for Types 3, 4 and 5 only)	≥ 95%	90 to 94.9%	< 90%
	Performance Credit	\$0	\$132,000	\$264,000
PO-4-03	Change Management Notice Delay 8 plus Days (Notification and Confirmation for Type 1, 2, 3, 4 and 5)			
	Performance Credit	\$13,200 per day		
PO-6-01	% Software Validation (See Note 1)			
	Performance Range	≤ 5%	5.1 to 10%	> 10%
	Performance Credit	\$0	\$52,800	\$528,000
PO-7-04	Delay Hours – Failed/Rejected Test Transactions – No Workaround (See Note 2)			
	Performance Credit	\$26,400 per day Per Release		

Note 1: Measured against releases pursuant to Change Notice Types 3, 4 and 5.

Note 2: PO-7-04 applies to failed Test Deck items executed by Verizon-MA in PO-6-01 and applies until all errors reported in PO-6-01 are fixed.

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William D. Smith
Senior Regulatory Counsel



January 16, 2001

Honorable Janet Hand Deixler
Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350

Re: Case 99-C-0949 – Petition for Reconsideration

Dear Secretary Deixler:

Enclosed please find an original and twenty-five (25) copies of the Petition for Reconsideration of Verizon New York Inc. in the above-referenced matter.

Respectfully submitted,

William D. Smith

Enclosure

cc: Active Parties (By E-mail and U.S. Mail)

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

-----X
Petition filed by Bell Atlantic-New York for :
Approval of a Performance Assurance Plan : Case 99-C-0949
and Change Control Assurance Plan, filed :
in C 97-C-0271. :
-----X

PETITION FOR RECONSIDERATION OF VERIZON NEW YORK INC.

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Senior Regulatory Counsel for
Verizon New York Inc.

Dated: New York, New York
January 16, 2001

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

-----X
Petition filed by Bell Atlantic-New York for :
Approval of a Performance Assurance Plan : Case 99-C-0949
and Change Control Assurance Plan, filed :
in C 97-C-0271. :
-----X

PETITION FOR RECONSIDERATION OF VERIZON NEW YORK INC.

I. INTRODUCTION

Verizon New York Inc. (~~“Verizon NY”~~) hereby petitions for reconsideration of two issues addressed by ~~the~~ New York State Public Service Commission (the “Commission”) in its recent order in the above-referenced proceeding ~~that~~ directed that certain modifications be made to the Performance Assurance Plan for Verizon NY (~~the~~ “PAP”).¹ The two issues relate to the appropriate level of disaggregation of the service quality measures and the appropriate scores for the Market Adjustment Scale.² As described below in ~~more~~ detail, the Commission has made a number of mistakes in fact in reaching its determination on these issues. Accordingly, the Commission, upon reconsideration, should modify its conclusions on these two issues and adopt the Verizon NY proposals set forth below.

¹ Case 99-C-0949 “Order Amending Performance Assurance Plan,” (issued December 15, 2000) (the “Order”).

² (See Order at 7, 9-10 and Attachments.)

II. A NUMBER OF THE MEASURES IN THE PERFORMANCE ASSURANCE PLAN SHOULD HAVE A GREATER LEVEL OF DISAGGREGATION

Pursuant to the annual review provisions of the Plan, the Order directed, *inter alia*, that certain modifications be made to the performance measures included in the PAP to conform with the changes to the Carrier-to-Carrier Guidelines performance measures that the Commission directed in a companion decision.³ Verizon NY has determined that a number of measures in the revised PAP are inconsistent with the updated level of disaggregation contained in the revised Carrier-to-Carrier Guidelines. In the revised Guidelines a number of measures have been disaggregated to enable a better “apples to apples” comparison for these parity measures. These disaggregated measures are not reflected in the PAP Compliance filing. The PAP measures should have the same level of disaggregation as is included in the Carrier-to-Carrier Guidelines. Verizon NY has discussed this with Staff, and it agrees that the level of disaggregation shown in the Carrier-to-Carrier Guideline should be reflected in the PAP. Therefore, the Commission should direct that the PAP be modified to include the disaggregated metrics.

In addition, the new metrics must be given appropriate weights so that an overall Mode of Entry (“MOE”) score can be calculated. This can be accomplished without significant impact to the PAP by re-allocating existing weights from the formerly aggregated measures. The new measures, which should be adopted to conform to the revised Carrier-to-Carrier Guidelines, with the appropriate weights are displayed in an Attachment. The Commission should adopt these proposed modifications.

³ Order at 5 (citing Case 97-C-0139).

III. THE MAXIMUM VALUES FOR THE UNE, RESALE, INTERCONNECTION AND DSL MOE SCORES MUST BE REVISED

The Order directed Verizon to modify the minimum and maximum values for the UNE, ~~Interconnection~~ and Resale MOE scores. It also set forth these values for the new DSL MOE. (Order at 10.) The Order asserts that these values were calculated “using the methodology implemented in the original PAP.” (Order at 10.) This is not correct as far as the maximum values are concerned, and these values ~~should~~ remain unchanged from the values in the original PAP. These maximum values are not statistically derived on the basis of the number of parity metrics, as are the minimum values and, thus, should ~~not~~ be changed, as were the minimum scores, due to the revised quantity of parity metrics in each MOE. These maximum values were based on economic and competitive factors and were associated with a level of performance where 100% of the dollars at risk in the MOE would be provided to the CLECs, if Verizon NY’s performance fell to the maximum value. Thus, no sound reason exists to reduce the maximum values and these values should remain at -0.67 for Resale, -0.67 for UNE and -1.00 for Trunks. The new MOE, DSL, should be consistent with the UNE and Resale MOEs with a -0.67 maximum value. Verizon NY’s proposal can be summarized as follows:

	2000 PAP	Order	Verizon Proposal
Resale	-0.67	-0.64845	-0.67
UNE	-0.67	-0.65086	-0.67
DSL	N/A	-0.63066	-0.67
Trunks	-1	-1.01773	-1

For the reasons set forth above, the Commission should retain the Maximum Market
~~Adjustment~~ Values for the PAP.

IV. CONCLUSION

For the reasons set forth above, the Commission should grant Verizon NY's Petition for
~~Reconsideration~~ and, upon reconsideration, adopt the proposed modifications.

Respectfully submitted,

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Senior Regulatory Counsel for
Verizon New York Inc.

Dated: New York, New York
January 16, 2001

ATTACHMENT

Table A-1-1: Resale - Mode of Entry Weights ¹

		PSC Weight	VZ Proposed Weight
PR	Provisioning		
4-01	% Missed Appointment - VZ - Total - Specials	10	
4-01	% Missed Appointment - VZ - Total - DSO		2
4-01	% Missed Appointment - VZ - Total - DS1		3
4-01	% Missed Appointment - VZ - Total - DS3		3
4-01	% Missed Appointment - VZ - Total - Specials Other		2
MR	Maintenance & Repair		
3-01	% Missed Repair Appointments - Loop	20	
3-01	% Missed Repair Appointments - Loop - Business		10
3-01	% Missed Repair Appointments - Loop - Residence		10
3-02	% Missed Repair Appointments - Central Office	5	
3-02	% Missed Repair Appointments - Central Office - Business		2
3-02	% Missed Repair Appointments - Central Office - Residence		3
4-02	Mean Time to Repair - Loop Trouble	15	
4-02	Mean Time to Repair - Loop Trouble - Business		5
4-02	Mean Time to Repair - Loop Trouble - Residence		10
4-03	Mean Time to Repair - CO Trouble	5	
4-03	Mean Time to Repair - CO Trouble - Business		5
4-03	Mean Time to Repair - CO Trouble - Residence		10
4-08	% Out of Service > 24 Hours - POTS	20	
4-08	% Out of Service > 24 Hours - POTS - Business		5
4-08	% Out of Service > 24 Hours - POTS - Residence		10

¹ Items in Bold are Critical Measures.

Table A-1-2: Unbundled Network Elements - Mode of Entry Weights ¹

		PSC Weight	VZ Proposed Weight
PR	Provisioning		
4-01	% Missed Appointment - VZ - Total - Specials	10	
4-01	% Missed Appointment - VZ - Total - DS0		2
4-01	% Missed Appointment - VZ - Total - DS1		3
4-01	% Missed Appointment - VZ - Total - DS3		3
4-01	% Missed Appointment - VZ - Total - Specials Other		2
6-01	% Installation Troubles within 30 days - POTS Other	15	
6-01	% Installation Troubles within 30 days - Platform		15
MR	Maintenance & Repair		
2-02	Network Trouble Report Rate - Loop (POTS)	10	
2-02	Network Trouble Report Rate - Loop - Platform		5
2-02	Network Trouble Report Rate - Loop - Loop		5
3-01	% Missed Repair Appointments - Loop	20	
3-01	% Missed Repair Appointments - Loop - Platform - Business		5
3-01	% Missed Repair Appointments - Loop - Platform - Residence		5
3-01	% Missed Repair Appointments - Loop - Loop		5
3-02	% Missed Repair Appointments - Central Office	5	
3-02	% Missed Repair Appointments - Central Office - Platform - Business		2
3-02	% Missed Repair Appointments - Central Office - Platform - Residence		3
3-02	% Missed Repair Appointments - Central Office - Loop		0
4-02	Mean Time to Repair - Loop Trouble	15	
4-02	Mean Time to Repair - Loop Trouble - Platform - Business		5
4-02	Mean Time to Repair - Loop Trouble - Platform - Residence		5
4-02	Mean Time to Repair - Loop Trouble - Loop		5
4-03	Mean Time to Repair - CO Trouble	5	
4-03	Mean Time to Repair - CO Trouble - Platform - Business		2
4-03	Mean Time to Repair - CO Trouble - Platform - Residence		3
4-03	Mean Time to Repair - CO Trouble - Loop		0
4-08	% Out of Service > 24 Hours - POTS	20	
4-08	% Out of Service > 24 Hours - POTS - Platform - Business		5
4-08	% Out of Service > 24 Hours - POTS - Platform - Residence		10
4-08	% Out of Service > 24 Hours - POTS - Loop		5
5-01	% Repeat Reports w/in 30 days - POTS	15	
5-01	% Repeat Reports w/in 30 days - POTS - Platform		10
5-01	% Repeat Reports w/in 30 days - POTS - Loop		5

¹ Items in **Bold** are Critical Measures.

APPENDIX 4



The Commonwealth of Massachusetts

**DEPARTMENT OF
TELECOMMUNICATIONS AND ENERGY**

November 3, 2000

SENT VIA E-MAIL AND U.S. MAIL

Bruce Beausejour, Esq.
General Counsel
Verizon Massachusetts
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Kelly Kiser, Esq.
Digital Broadband Communications, Inc.
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Washington, DC 20005

Re: xDSL Data Reconciliation

Dear Messrs. Beausejour and Kiser:

The Commissioners of the Department of Telecommunications and Energy ("Department") have asked me to issue the following requests and directives. The Department hereby invites Verizon Massachusetts ("Verizon") and Digital Broadband Communications, Inc. ("Digital Broadband") to a meeting at the Department's offices on Wednesday, November 8, 2000, to discuss information contained in both Verizon's and Digital Broadband's filings made with the Federal Communications Commission ("FCC") in CC Docket No. 00-176, the FCC's investigation of Verizon's § 271 application.

The purpose of this meeting is for the Department to resolve certain competing claims concerning Verizon's xDSL performance, raised in Digital Broadband's October 16, 2000, FCC comments. To assist the FCC in its review of Verizon's filing, the Department specifically directs Verizon to provide Digital Broadband and the Department with Digital Broadband's local service requests for xDSL-loops for July, 2000, no later than Monday, November 6, 2000. Similarly, the Department directs Digital Broadband to provide its records for its xDSL loop orders made in July, 2000, to the Department and Verizon by